

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

JESSICA CHEATHAM, <i>Plaintiff,</i> v. SCHLUMBERGER TECHNOLOGY CORPORATION, <i>Defendant.</i>	Case. No. 4:20-cv-02193
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PLAINTIFF JESSICA CHEATHAM'S PROPOSED INTERROGATORIES

Plaintiff Jessica Cheatham submits these proposed jury interrogatories.

INTERROGATORY NUMBER ONE:

Has Plaintiff Jessica Cheatham proven by a preponderance of the evidence that Defendant Schlumberger Technology Corporation discriminated against her on the basis of her sex or gender?

Answer "Yes" or "No": _____

INTERROGATORY NUMBER TWO:

Has Plaintiff Jessica Cheatham proven by a preponderance of the evidence that Defendant Schlumberger Technology Corporation subjected her to a hostile work environment?

Answer "Yes" or "No": _____

INTERROGATORY NUMBER THREE:

Has Plaintiff Jessica Cheatham proven by a preponderance of the evidence that she was constructively discharged?

Answer "Yes" or "No": _____

INTERROGATORY NUMBER FOUR:

Has Plaintiff Jessica Cheatham proven by a preponderance of the evidence that Defendant Schlumberger Technology Corporation retaliated against her?

Answer "Yes" or "No": _____

INTERROGATORY NUMBER FIVE:

Do you find that Plaintiff Jessica Cheatham should be awarded compensatory damages for pain and suffering, inconvenience, or mental anguish, if any?

Answer "Yes" or "No": _____

[If you answer "Yes" to Interrogatory No. 5, then answer Interrogatory No. 6.]

INTERROGATORY NUMBER SIX:

What sum of money, if any, should be awarded to Plaintiff Jessica Cheatham for compensatory damages for pain and suffering, inconvenience, or mental anguish?

Answer in Dollars and Cents: \$_____

INTERROGATORY NUMBER SEVEN:

Do you find that the plaintiff should be awarded punitive damages based on the defendant's reprehensible conduct, if any?

Answer "Yes" or "No": _____

[If you answer "Yes" to Interrogatory No. 7, then answer Interrogatory No. 8.]

INTERROGATORY NUMBER EIGHT:

What sum of money, if any, should be awarded to the plaintiff for any reprehensible conduct of the defendant that you have found, as punitive damages?

Answer in Dollars and Cents: \$ _____

Dated: July 25, 2023

Respectfully submitted,

/s/ Michael D. Palmer

Michael D. Palmer (Admitted *Pro Hac Vice*)

Nicole E. Wiitala (Admitted *Pro Hac Vice*)

Andrew Macurdy (Admitted *Pro Hac Vice*)

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CERTIFICATE OF SERVICE

I hereby certify that on July 25, 2023, a true and correct copy of the foregoing was served upon counsel of record via ECF.

/s/ Michael D. Palmer
Michael D. Palmer